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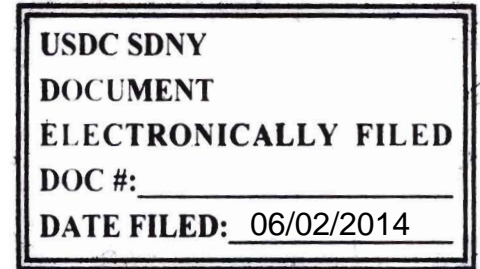
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May 29, 2014

**Via Electronic Mail**

The Honorable Jesse M. Furman, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007



Re: Ojeda v. Viacom, Inc.  
Docket No.: 13-CV-5658 (JMF)

Dear Judge Furman:

This firm is counsel to Plaintiffs in the above-referenced wage and hour litigation. In furtherance of Your Honor's May 23, 2014 Order, the parties jointly propose the following revised discovery schedule:

- a. All discovery relating to class certification issues shall be completed no later than February 1, 2015.
- b. All fact discovery shall be completed by no later than July 1, 2015.
- c. All expert discovery, including reports, production of the underlying documents, and depositions, shall be completed no later than July 15, 2015.

The parties respectfully request that they be allowed seek leave of the Court to modify this schedule in the event a class is certified, and/or in the event the discovery process proves more extensive than presently anticipated.

Respectfully submitted,

/s/ Lloyd R. Ambinder

cc: Jeffrey K. Brown, Esq.  
Lyle S. Zuckerman,  
Michael J. Goettig

The proposed schedule is hereby adopted. The parties are cautioned that given the length of time allotted, they should not necessarily assume that they will be granted extensions. The parties shall also appear for a conference on February 3, 2015, at 3 p.m. SO ORDERED.

June 2, 2014